

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

KAYLA J. GILES

CIVIL ACTION NO. 1:19-cv-01173

VERSUS

CHIEF JUDGE DEE D. DRELL

DELTA DEFENSE, L.L.C., and
UNITED SPECIALTY INSURANCE COMPANY
Defendants

MAGISTRATE JUDGE JOSEPH
H.L. PEREZ-MONTES

MOTION FOR STAY OF PROCEEDINGS

NOW INTO COURT, through undersigned counsel, comes plaintiff, Kayla J. Giles, a/k/a Kayla Giles Coutee, who respectfully represents that:

1.

Kayla J. Giles instituted this action seeking recovery under the terms of an insurance policy.

2.

Motions for Summary Judgment were filed by the defendants and are pending on the docket of this court.

3.

Mover is under indictment on the charge of second degree murder as well as obstruction of justice in the Ninth Judicial District Court in and for Rapides Parish, Louisiana, with a trial date set for May 17, 2021. As she is facing the potential of life imprisonment if convicted, her criminal defense attorney has advised that she assert her rights under the Fifth Amendment to the United States Constitution in all civil proceedings.

4.

Mover therefore seeks an order of this court staying further action in this matter to allow her to be able to fully and completely participate in this matter and for the reasons set forth in the attached memorandum.

Wherefore, Kayla J. Giles prays that this court enter an order staying all action in this matter until after the disposition of the criminal proceedings in the Ninth Judicial District Court in and for Rapides Parish, Louisiana.

LAW OFFICE OF,

/S/ THOMAS R. WILLSON _____
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Attorney for Kayla J. Giles (#13546)

Certificate of Service

I hereby certify that this Motion was provided to Counsel for United Specialty Insurance Company, Celeste D. Elliott, by depositing the same in the U.S. Mail addressed to 601 Poydras Street, Suite 2775, New Orleans, La. 70130, and counsel for Counsel for Delta Defense, L.L.C., W. Scarth Clark and Megan B. Jacqmin, by depositing the same in the U.S. Mail addressed to 2030 St. Charles Avenue, New Orleans, La. 70130, with sufficient postage affixed, this 24th day of September, 2020.

/S/ THOMAS R. WILLSON _____
THOMAS R. WILLSON